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10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**
12 **SACRAMENTO DIVISION**

14 STACEY SAVY MEAS,	}	Case No.: 2:24-cv-01295-CKD
15 Plaintiff,		STIPULATION AND ORDER FOR AN
16 vs.		EXTENSION OF TIME
17 COMMISSIONER OF SOCIAL SECURITY,		
18 Defendant.		
19		

20
21 Pending the Court's approval, the parties hereby stipulate that the time for Defendant to
22 respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from
23 September 13, 2024, up to and including October 15, 2024.

24 This is Defendant's first request for an extension, and it is made with good cause.
25 Defendant's counsel has worked diligently to meet the timelines provided by the Court but has
26 been prevented from doing so by her busy schedule. Defendant's counsel has five briefs due
27 during the one-week period between September 9 and September 16, 2024. Defendant requests
28 this extension in good faith and with no intent to delay these proceedings unnecessarily.

1 The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

3 Respectfully submitted,

4 Dated: September 3, 2024

/s/ Josephine Mary Gerrard*
(*as authorized via e-mail on September 3, 2024)
JOSEPHINE MARY GERRARD
Attorney for Plaintiff

7 Dated: September 3, 2024

8 PHILLIP A. TALBERT
United States Attorney

9 MATHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7

11 By: /s/ Mary Tsai
12 MARY TSAI
13 Special Assistant U.S. Attorney
14 Office of Program Litigation, Office 7

15 Attorneys for Defendant

16 **ORDER**

17 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
18 extension, up to and including October 15, 2024, to respond to Plaintiff's Motion for Summary
19 Judgment.

20 Dated: September 5, 2024


CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE